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Attorneys for Plaintiff  
MICHAEL SHANE

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MICHAEL SHANE	)	Case No.: 2:16-cv-02263-JAD-CWH
	)	
Plaintiff,	)	STIPULATION TO EXTEND TIME
v.	)	TO FILE MOTION FOR REVERSAL
	)	AND/OR REMAND
NANCY A. BERRYHILL, Acting	)	
Commissioner of Social Security.	)	(FIRST REQUEST)
	)	
Defendant.	)	
	)	
	)	

Plaintiff Michael Shane and Defendant Nancy A. Berryhill, Acting  
Commissioner of Social Security, through their undersigned attorneys, stipulate,  
subject to this court's approval, to extend the time to May 4, 2017 for Plaintiff to  
file Plaintiff's Motion for Reversal and/or Remand; and that Defendant shall have  
until June 5, 2017, to file her opposition, if any is forthcoming. Any reply by  
plaintiff will be due June 26, 2017.

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1 As the Court is aware, after a 5 year battle with terminal stage 4 cancer  
2 Plaintiff's Counsel's Spouse of the associate, who this matter is assigned to, passed  
3 away on September 30, 2016. The aftermath of this traumatic event on both  
4 Counsel and his 9 year old son and 7 year old daughter was immeasurable.  
5 Compounding the impact of this loss is the fact that Counsel's spouse was a former  
6 employee at Counsel's Law Firm and her death was far reaching in its impact on  
7 Counsel's professional life as well. Due to the death, the subsequent holiday  
8 period, and the need to find a permanent caregiver and the required time to  
9 acclimate his children to that presence during his absence to meet his professional  
10 obligations, Counsel requires the additional time to prepare and file her motion for  
11 summary judgment.

12 Counsel for plaintiff does not anticipate this extraordinary request for more  
13 time to become the rule and recognizes it is the extraordinary exception and  
14 sincerely apologizes to the court for any inconvenience this may have had upon it  
15 or its staff.

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1 DATE: March 8, 2017

Respectfully submitted,

2 ROHLFING & KALAGIAN, LLP

3 /s/ *Marc V. Kalagian*

4 BY: \_\_\_\_\_

Marc V. Kalagian

Attorney for plaintiff Mr. Michael Shane

7 DATE: March 8, 2017

Daniel G. Bogden

United States Attorney

9 /s/ *Tina Naicker*

10 BY: \_\_\_\_\_

11 Tina Naicker

Special Assistant United States Attorney

12 Attorneys for defendant Nancy A. Berryhill

13 [\*authorized by e-mail]

14 DATED: March 14, 2017

16 IT IS SO ORDERED: \_\_\_\_\_

17 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE  
FOR CASE NUMBER 2:16-CV-02263-JAD-CWH**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on March 8, 2017.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

*/s/ Marc V. Kalagian*

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Marc V. Kalagian  
Attorneys for Plaintiff